

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Obj. Deadline: November 14, 2023 at 4:00 p.m. ET

**SIXTH MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS  
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM MAY 1, 2023 THROUGH AND INCLUDING MAY 31, 2023**

|  |  |
|--|--|
| <b>Name of Applicant</b>   | <b>Ernst &amp; Young LLP</b>                               |
| Authorized to Provide Professional Services to:                              | the Debtors and Debtors-in-Possession                      |
| Date of Retention:   | January 17, 2023 <i>nunc pro tunc</i> to November 28, 2022 |
| Period for which compensation and reimbursement is sought:                   | May 1, 2023 through May 31, 2023                           |
| Amount of Compensation sought as actual, reasonable and necessary:           | \$1,327,255.00   |
| 80% of Compensation sought as actual, reasonable and necessary:              | \$1,061,804.00   |
| Amount of Expense Reimbursement sought as actual, reasonable, and necessary: | \$17,767.20  |

This is a(n) ☒ monthly \_\_\_\_ interim \_\_\_\_ final application. No prior application has been filed with respect to this Fee Period.

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

**SUMMARY OF BILLING BY PROFESSIONAL**  
**MAY 1, 2023 THROUGH AND INCLUDING MAY 31, 2023**

| <b>Name</b>                      | <b>Type</b> | <b>Rank</b>                | <b>Hours</b> | <b>Hourly Rate</b> | <b>Total Individual Fees</b> |
|----------------------------------|-------------|----------------------------|--------------|--------------------|------------------------------|
| Lowery,Kristie L                 | Billable    | National Partner/Principal | 35.80        | \$990.00           | \$35,442.00                  |
| Lowery,Kristie L                 | Travel      | National Partner/Principal | 10.00        | \$495.00           | \$4,950.00                   |
| McComber,Donna                   | Billable    | National Partner/Principal | 24.20        | \$990.00           | \$23,958.00                  |
| Rumford,Neil                     | Billable    | National Partner/Principal | 1.40         | \$990.00           | \$1,386.00                   |
| Stevens,Matthew Aaron            | Billable    | National Partner/Principal | 0.90         | \$990.00           | \$891.00                     |
| Bailey,Doug                      | Billable    | Partner/Principal          | 24.70        | \$825.00           | \$20,377.50                  |
| Blank,Jacob                      | Billable    | Partner/Principal          | 0.40         | \$825.00           | \$330.00                     |
| Burns,Jack M                     | Billable    | Partner/Principal          | 0.50         | \$825.00           | \$412.50                     |
| Cavusoglu,Coskun                 | Billable    | Partner/Principal          | 6.80         | \$825.00           | \$5,610.00                   |
| Delff,Björn                      | Billable    | Partner/Principal          | 3.50         | \$825.00           | \$2,887.50                   |
| Erdem,Ersin                      | Billable    | Partner/Principal          | 7.50         | \$825.00           | \$6,187.50                   |
| Farrar,Anne                      | Billable    | Partner/Principal          | 10.10        | \$825.00           | \$8,332.50                   |
| Ferris,Tara                      | Billable    | Partner/Principal          | 7.40         | \$825.00           | \$6,105.00                   |
| Gall,Phillip J                   | Billable    | Partner/Principal          | 0.50         | \$825.00           | \$412.50                     |
| Harvey,Elizabeth R.              | Billable    | Partner/Principal          | 0.90         | \$825.00           | \$742.50                     |
| Knoeller,Thomas J.               | Billable    | Partner/Principal          | 18.90        | \$825.00           | \$15,592.50                  |
| Leston,Juan                      | Billable    | Partner/Principal          | 2.00         | \$825.00           | \$1,650.00                   |
| Lovelace,Lauren                  | Billable    | Partner/Principal          | 33.00        | \$825.00           | \$27,225.00                  |
| Nasir,Tariq                      | Billable    | Partner/Principal          | 0.50         | \$825.00           | \$412.50                     |
| Richards,Briana A.               | Billable    | Partner/Principal          | 0.40         | \$1,150.00         | \$460.00                     |
| Shea JR,Thomas M                 | Billable    | Partner/Principal          | 92.30        | \$825.00           | \$76,147.50                  |
| Shnaider,Jeremy                  | Billable    | Partner/Principal          | 0.50         | \$825.00           | \$412.50                     |
| Taylor,John Marcus               | Billable    | Partner/Principal          | 1.50         | \$825.00           | \$1,237.50                   |
| Tse,Andy                         | Billable    | Partner/Principal          | 0.50         | \$825.00           | \$412.50                     |
| Walker,Rachael Leigh<br>Braswell | Billable    | Partner/Principal          | 9.90         | \$825.00           | \$8,167.50                   |
| Weiler,Sam P                     | Billable    | Partner/Principal          | 0.50         | \$825.00           | \$412.50                     |
| Borts,Michael                    | Billable    | Managing Director          | 5.10         | \$775.00           | \$3,952.50                   |
| Bost,Anne                        | Billable    | Managing Director          | 48.35        | \$775.00           | \$37,471.25                  |
| Charbonneau,Claudine             | Billable    | Managing Director          | 0.50         | \$775.00           | \$387.50                     |
| DeVincenzo,Jennie                | Billable    | Managing Director          | 23.60        | \$775.00           | \$18,290.00                  |
| DeVincenzo,Jennie                | Travel      | Managing Director          | 2.80         | \$387.50           | \$1,085.00                   |
| Dubroff,Andy                     | Billable    | Managing Director          | 0.90         | \$775.00           | \$697.50                     |
| Flagg,Nancy A.                   | Billable    | Managing Director          | 22.00        | \$775.00           | \$17,050.00                  |
| Fletcher,Jason R                 | Billable    | Managing Director          | 2.50         | \$775.00           | \$1,937.50                   |
| Gartin,Randell J.                | Billable    | Managing Director          | 1.00         | \$775.00           | \$775.00                     |
| Koch,Markus                      | Billable    | Managing Director          | 0.50         | \$775.00           | \$387.50                     |
| Moncrieff,Robert                 | Billable    | Managing Director          | 1.10         | \$775.00           | \$852.50                     |
| Phillips,La-Tanya                | Billable    | Managing Director          | 6.20         | \$775.00           | \$4,805.00                   |
| Ritz,Amy Felice                  | Billable    | Managing Director          | 4.60         | \$775.00           | \$3,565.00                   |
| Sargent,Amy Johannah             | Billable    | Managing Director          | 1.00         | \$775.00           | \$775.00                     |

| <b>Name</b>               | <b>Type</b> | <b>Rank</b>       | <b>Hours</b> | <b>Hourly Rate</b> | <b>Total Individual Fees</b> |
|---------------------------|-------------|-------------------|--------------|--------------------|------------------------------|
| Schmutter,David           | Billable    | Managing Director | 1.50         | \$775.00           | \$1,162.50                   |
| Soderman,Kathy            | Billable    | Managing Director | 0.80         | \$775.00           | \$620.00                     |
| Berman,Jake               | Billable    | Senior Manager    | 69.10        | \$650.00           | \$44,915.00                  |
| Bowden,Jamie              | Billable    | Senior Manager    | 0.50         | \$650.00           | \$325.00                     |
| Bruns,Alexander           | Billable    | Senior Manager    | 4.20         | \$650.00           | \$2,730.00                   |
| Chambron,Claire           | Billable    | Senior Manager    | 0.20         | \$650.00           | \$130.00                     |
| Coffey,Mandy V.           | Billable    | Senior Manager    | 0.30         | \$650.00           | \$195.00                     |
| Cohen,Sam                 | Billable    | Senior Manager    | 1.80         | \$650.00           | \$1,170.00                   |
| Collado,Adriana           | Billable    | Senior Manager    | 11.40        | \$650.00           | \$7,410.00                   |
| Devona Bahadur,Michele    | Billable    | Senior Manager    | 6.40         | \$650.00           | \$4,160.00                   |
| Dunne,Robert              | Billable    | Senior Manager    | 0.60         | \$650.00           | \$390.00                     |
| Espley-Ault,Olivia        | Billable    | Senior Manager    | 18.60        | \$650.00           | \$12,090.00                  |
| Gatt,Katie                | Billable    | Senior Manager    | 4.30         | \$650.00           | \$2,795.00                   |
| Gundu,Kaivalya            | Billable    | Senior Manager    | 6.20         | \$650.00           | \$4,030.00                   |
| Gursoy,Damla              | Billable    | Senior Manager    | 14.70        | \$650.00           | \$9,555.00                   |
| Haas,Zach                 | Billable    | Senior Manager    | 15.80        | \$650.00           | \$10,270.00                  |
| Hamano,Taisuke            | Billable    | Senior Manager    | 2.50         | \$650.00           | \$1,625.00                   |
| Healy,John                | Billable    | Senior Manager    | 15.60        | \$650.00           | \$10,140.00                  |
| Hernandez,Nancy I.        | Billable    | Senior Manager    | 18.80        | \$650.00           | \$12,220.00                  |
| Howard,Rebecca M.         | Billable    | Senior Manager    | 2.30         | \$650.00           | \$1,495.00                   |
| Jimenez,Joseph Robert     | Billable    | Senior Manager    | 18.90        | \$650.00           | \$12,285.00                  |
| Khubani,Arpita            | Billable    | Senior Manager    | 0.50         | \$650.00           | \$325.00                     |
| Knüwer,Stephanie          | Billable    | Senior Manager    | 1.60         | \$650.00           | \$1,040.00                   |
| Krug,Judith               | Billable    | Senior Manager    | 1.60         | \$650.00           | \$1,040.00                   |
| Li,Peng                   | Billable    | Senior Manager    | 0.90         | \$650.00           | \$585.00                     |
| Madhok,Kishan             | Billable    | Senior Manager    | 1.50         | \$650.00           | \$975.00                     |
| Mayer-Dempsey,Chris Kosch | Billable    | Senior Manager    | 0.50         | \$650.00           | \$325.00                     |
| Mosdzin,Dennis            | Billable    | Senior Manager    | 3.00         | \$650.00           | \$1,950.00                   |
| Musano,Matthew Albert     | Billable    | Senior Manager    | 50.70        | \$650.00           | \$32,955.00                  |
| Nguyen,Ly Vu-Uyen         | Billable    | Senior Manager    | 0.20         | \$650.00           | \$130.00                     |
| Nichol,T.J.               | Billable    | Senior Manager    | 0.40         | \$650.00           | \$260.00                     |
| Papachristodoulou,Elpida  | Billable    | Senior Manager    | 2.00         | \$650.00           | \$1,300.00                   |
| Pawa,Kunal                | Billable    | Senior Manager    | 1.20         | \$650.00           | \$780.00                     |
| Rule,Martin Daniel        | Billable    | Senior Manager    | 2.10         | \$650.00           | \$1,365.00                   |
| Schwarzwälder,Christian   | Billable    | Senior Manager    | 3.50         | \$650.00           | \$2,275.00                   |
| Tong,Chia-Hui             | Billable    | Senior Manager    | 109.40       | \$650.00           | \$71,110.00                  |
| Wong,Charlotte            | Billable    | Senior Manager    | 0.60         | \$650.00           | \$390.00                     |
| Wong,Wendy                | Billable    | Senior Manager    | 2.50         | \$650.00           | \$1,625.00                   |
| Yang,Rachel Sim           | Billable    | Senior Manager    | 35.80        | \$650.00           | \$23,270.00                  |
| Barnet,Scott              | Billable    | Manager           | 0.70         | \$525.00           | \$367.50                     |
| Bouza,Victor              | Billable    | Manager           | 13.30        | \$525.00           | \$6,982.50                   |
| Cahalane,Shawn M.         | Billable    | Manager           | 98.50        | \$525.00           | \$51,712.50                  |
| Carreras,Stephen          | Billable    | Manager           | 10.00        | \$525.00           | \$5,250.00                   |

| Name                      | Type     | Rank    | Hours  | Hourly Rate | Total Individual Fees |
|---------------------------|----------|---------|--------|-------------|-----------------------|
| Davis,Kathleen F.         | Billable | Manager | 3.80   | \$525.00    | \$1,995.00            |
| Dulceak,Crystal           | Billable | Manager | 11.10  | \$525.00    | \$5,827.50            |
| Fitzgerald,Kevin          | Billable | Manager | 0.40   | \$525.00    | \$210.00              |
| Fitzmaurice,Sean          | Billable | Manager | 2.40   | \$525.00    | \$1,260.00            |
| Gil Diez de Leon,Marta    | Billable | Manager | 26.00  | \$525.00    | \$13,650.00           |
| Hammon,David Lane         | Billable | Manager | 52.10  | \$525.00    | \$27,352.50           |
| Jena,Deepak               | Billable | Manager | 7.90   | \$525.00    | \$4,147.50            |
| Katsnelson,David          | Billable | Manager | 18.20  | \$525.00    | \$9,555.00            |
| Lindsey,Krista            | Billable | Manager | 0.50   | \$525.00    | \$262.50              |
| Mak,Shirley               | Billable | Manager | 0.30   | \$525.00    | \$157.50              |
| McPhee,Tiffany            | Billable | Manager | 4.20   | \$525.00    | \$2,205.00            |
| Mistler,Brian M           | Billable | Manager | 141.20 | \$525.00    | \$74,130.00           |
| Mistler,Brian M           | Travel   | Manager | 9.20   | \$262.50    | \$2,415.00            |
| Nunna,Ramesh kumar        | Billable | Manager | 16.00  | \$525.00    | \$8,400.00            |
| Richardson,Audrey Sarah   | Billable | Manager | 4.70   | \$525.00    | \$2,467.50            |
| Srivastava,Nikita Asutosh | Billable | Manager | 8.10   | \$525.00    | \$4,252.50            |
| Staromiejska,Kinga        | Billable | Manager | 31.40  | \$525.00    | \$16,485.00           |
| Tsikkouris,Anastasios     | Billable | Manager | 7.20   | \$525.00    | \$3,780.00            |
| Wrenn,Kaitlin Doyle       | Billable | Manager | 85.30  | \$525.00    | \$44,782.50           |
| Wrenn,Kaitlin Doyle       | Travel   | Manager | 10.00  | \$262.50    | \$2,625.00            |
| Zheng,Eva                 | Billable | Manager | 44.50  | \$525.00    | \$23,362.50           |
| Ancona,Christopher        | Billable | Senior  | 155.60 | \$395.00    | \$61,462.00           |
| Borchers,Fabian           | Billable | Senior  | 9.60   | \$395.00    | \$3,792.00            |
| Bote,Justin               | Billable | Senior  | 25.00  | \$395.00    | \$9,875.00            |
| Carver,Cody R.            | Billable | Senior  | 14.00  | \$395.00    | \$5,530.00            |
| Di Stefano,Giulia         | Billable | Senior  | 35.00  | \$395.00    | \$13,825.00           |
| Hall,Emily Melissa        | Billable | Senior  | 58.30  | \$395.00    | \$23,028.50           |
| Katelas,Andreas           | Billable | Senior  | 79.10  | \$395.00    | \$31,244.50           |
| Li,Chunyang               | Billable | Senior  | 12.30  | \$395.00    | \$4,858.50            |
| MacLean,Corrie            | Billable | Senior  | 67.40  | \$395.00    | \$26,623.00           |
| Marlow,Joe                | Billable | Senior  | 7.10   | \$395.00    | \$2,804.50            |
| Molnar,Evgeniya           | Billable | Senior  | 20.10  | \$395.00    | \$7,939.50            |
| Perez,Ellen Joy           | Billable | Senior  | 22.40  | \$395.00    | \$8,848.00            |
| Rahming,Brinique          | Billable | Senior  | 5.20   | \$395.00    | \$2,054.00            |
| Rodriguez,Lenny           | Billable | Senior  | 0.20   | \$395.00    | \$79.00               |
| Rüegg,Christoph           | Billable | Senior  | 1.70   | \$395.00    | \$671.50              |
| Sangster,Mark             | Billable | Senior  | 2.00   | \$395.00    | \$790.00              |
| Schernbacher, Maximilian  | Billable | Senior  | 0.30   | \$395.00    | \$118.50              |
| Shabanaj,Vlora            | Billable | Senior  | 3.00   | \$395.00    | \$1,185.00            |
| Short,Victoria            | Billable | Senior  | 62.90  | \$395.00    | \$24,845.50           |
| Skarou,Tonia              | Billable | Senior  | 6.30   | \$395.00    | \$2,488.50            |
| Sun,Yuchen                | Billable | Senior  | 10.10  | \$395.00    | \$3,989.50            |
| Themistou,Victoria        | Billable | Senior  | 3.30   | \$395.00    | \$1,303.50            |

| <b>Name</b>                | <b>Type</b> | <b>Rank</b>                  | <b>Hours</b>    | <b>Hourly Rate</b> | <b>Total Individual Fees</b> |
|----------------------------|-------------|------------------------------|-----------------|--------------------|------------------------------|
| Wagner,Kaspar              | Billable    | Senior                       | 10.90           | \$395.00           | \$4,305.50                   |
| Yildiz,Elif                | Billable    | Senior                       | 6.90            | \$395.00           | \$2,725.50                   |
| Yuan,Peiyi                 | Billable    | Senior                       | 4.80            | \$395.00           | \$1,896.00                   |
| Zhu,Philip                 | Billable    | Senior                       | 5.30            | \$395.00           | \$2,093.50                   |
| Allen,Jenefier Michelle    | Billable    | Staff                        | 0.80            | \$225.00           | \$180.00                     |
| Brittany Coakley,Breshante | Billable    | Staff                        | 7.60            | \$225.00           | \$1,710.00                   |
| Choudary,Hira              | Billable    | Staff                        | 74.55           | \$225.00           | \$16,773.75                  |
| Cigarruista,Ana            | Billable    | Staff                        | 0.40            | \$225.00           | \$90.00                      |
| Demirkol,Kenan             | Billable    | Staff                        | 14.70           | \$225.00           | \$3,307.50                   |
| Fitzgerald,Kaitlin Rose    | Billable    | Staff                        | 19.80           | \$225.00           | \$4,455.00                   |
| Geisler,Arthur             | Billable    | Staff                        | 17.00           | \$225.00           | \$3,825.00                   |
| Glattstein,Arielle         | Billable    | Staff                        | 1.70            | \$225.00           | \$382.50                     |
| Hall,Olivia                | Billable    | Staff                        | 4.20            | \$225.00           | \$945.00                     |
| Huang,Vanesa               | Billable    | Staff                        | 0.30            | \$225.00           | \$67.50                      |
| Jelonek,Theresa Grace      | Billable    | Staff                        | 7.10            | \$225.00           | \$1,597.50                   |
| Johnson,Derrick Joseph     | Billable    | Staff                        | 20.30           | \$225.00           | \$4,567.50                   |
| Karan,Anna Suncheuri       | Billable    | Staff                        | 38.30           | \$225.00           | \$8,617.50                   |
| Lubic,Jake                 | Billable    | Staff                        | 1.30            | \$225.00           | \$292.50                     |
| Neziroski,David            | Billable    | Associate                    | 34.30           | \$365.00           | \$12,519.50                  |
| Ortiz,Daniella             | Billable    | Staff                        | 6.30            | \$225.00           | \$1,417.50                   |
| Pierce,Brandon             | Billable    | Staff                        | 3.80            | \$225.00           | \$855.00                     |
| Stillman,Will              | Billable    | Staff                        | 1.00            | \$225.00           | \$225.00                     |
| Velpuri,Cury               | Billable    | Staff                        | 10.00           | \$225.00           | \$2,250.00                   |
| Wong,Maddie                | Billable    | Staff                        | 12.80           | \$225.00           | \$2,880.00                   |
| Zhuo,Melody                | Billable    | Staff                        | 41.50           | \$225.00           | \$9,337.50                   |
| Scott,James                | Billable    | Client Serving Contractor JS | 99.50           | \$600.00           | \$59,700.00                  |
| Scott,James                | Travel      | Client Serving Contractor JS | 3.70            | \$300.00           | \$1,110.00                   |
| Bieganski,Walter           | Billable    | Client Serving Contractor WB | 22.70           | \$200.00           | \$4,540.00                   |
|                            |             |                              |                 |                    |                              |
| <b>Totals</b>              |             |                              | <b>2,526.70</b> |                    | <b>\$1,327,255.00</b>        |

<sup>1</sup> Travel fees are billed out at 50% bill rate

**Blended Hourly Rate: \$525.29**

**STATEMENT OF FEES BY PROJECT CATEGORY**  
**MAY 1, 2023 THROUGH AND INCLUDING MAY 31, 2023**

| <b>Project Category</b>                     | <b>Project Category Description</b>   | <b>Hours</b> | <b>Fees</b>  |
|---|---|--------------|--------------|
| Fee/Employment Applications                 | This category relates to the preparation of EY's employment application and planning and coordinating the professionals' time protocols, preparation of monthly fee statements, preparation of interim fee applications, invoices, and responding to inquiries  | 169.60       | \$79,825.00  |
| Information Reporting                       | Reporting of income paid to certain US-based investors, vendors, and independent contractors  | 27.80        | \$9,507.50   |
| IRS Audit Matters                           | Responding to the inquiries of the IRS related to current/prior tax years.  | 191.40       | \$118,255.00 |
| Meetings with Management                    | This category relates to meetings held with Management, EY, and other Debtors' professionals to coordinate work plans, analyses, data collection and deliverables.  | 144.60       | \$91,155.50  |
| Meetings with Other Advisors                | This category relates to meetings, discussions and email correspondence with other advisors, including the Debtor's and creditor's legal counsel and financial advisors, as well as, other stakeholders.  | 70.75        | \$47,014.75  |
| Non US Tax                                  | Taxation of all non-US based or related activities and taxpayers  | 451.25       | \$212,939.75 |
| Non-Working Travel (billed at 50% of rates) | This category includes all travel time not otherwise chargeable to the Debtors. This time is charged at a 50% rate.   | 35.70        | \$12,185.00  |
| Payroll Tax                                 | Taxation of Global and US-based payroll and employment tax requirements   | 210.20       | \$109,320.50 |
| Project Management Office Transition        | Preparation for, attendance at and participation in periodic meetings, discussions and analyses regarding coordination of EY services and international teams in order to align on information, assumptions, and issues.  | 229.60       | \$121,427.50 |
| Tax Advisory                                | The projects covered by on-call tax advisory services include assistance with tax issues by answering one-off questions, drafting memos describing how specific tax rules work, assisting with general transactional issues, and assisting Client in connection with International Tax Services dealings with tax authorities (other than representing Client in an examination or an appeal before the IRS or other taxing authority). | 97.60        | \$44,206.00  |
| Technology                                  | Ingestion, transformation, and analysis of FTX data to be leveraged by the tax workstreams in order to facilitate the preparation and completion of deliverables.   | 55.40        | \$28,138.50  |
| Transfer Pricing                            | Determine arm's length pricing in related-party transactions  | 114.50       | \$74,860.50  |

| <b>Project Category</b> | <b>Project Category Description</b>   | <b>Hours</b>    | <b>Fees</b>           |
|-------------------------|---|-----------------|-----------------------|
| US Income Tax           | Taxation of all US-based or related activities and taxpayers  | 226.20          | \$136,386.00          |
| US International Tax    | Taxation of all non-US based or related activities as it impacts on US based taxpayers                        | 175.90          | \$85,852.00           |
| US State and Local Tax  | Taxation of all US-based or related activities and taxpayers as assessed by each state and local jurisdiction | 291.50          | \$138,337.00          |
| Value Added Tax         | Taxation of non-US based indirect based or related activities and taxpayers                                   | 34.70           | \$17,844.50           |
| <b>Total</b>            |   | <b>2,526.70</b> | <b>\$1,327,255.00</b> |

**SUMMARY OF ACTUAL AND NECESSARY EXPENSES**

| Expense Category         | Expense Amount     |
|--------------------------|--------------------|
| Airfare                  | \$6,162.30         |
| Ground Transportation    | \$1,208.41         |
| Lodging                  | \$4,256.97         |
| Meals                    | \$1,231.42         |
| Miscellaneous            | \$28.00            |
| Value Added Tax - Panama | \$525.00           |
| Value Added Tax - Turkey | \$4,355.10         |
| <b>Total</b>             | <b>\$17,767.20</b> |



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**SIXTH MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS  
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM MAY 1, 2023 THROUGH AND MAY 31, 2023**

Ernst & Young LLP (“EY LLP”), Tax Services Provider to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this sixth monthly fee statement (this “Monthly Fee Statement”) for compensation for professional services rendered and expenses incurred for the period from May 1, 2023 through and including May 31, 2023 (the “Fee Period”). In support of the Monthly Fee Statement, EY LLP respectfully states as follows:

**Background**

1. On November 11 and November 14, 2022,<sup>2</sup> the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified,

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.

the “Bankruptcy Code”). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors’ cases (the “Chapter 11 Cases”) was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 17, 2023, the Court entered the Order Authorizing the Retention and Employment of EY LLP as Tax Services Provider *Nunc Pro Trunc* to November 28, 2022 [D.I. 505] authorizing the retention and employment of EY LLP as the Debtors’ Tax Services Provider, *nunc pro tunc* to November 28, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] (the “Interim Compensation Order”).

### **Relief Requested**

4. By this Monthly Fee Statement and in accordance with the Interim Compensation Order, EY LLP makes this application for (i) allowance of compensation as an administrative expense of the Debtors’ estates in the amount of \$1,327,255.00 for reasonable and necessary professional services rendered, (ii) payment of compensation in the amount of 80% thereof (in the amount of \$1,061,804.00) and (iii) payment of \$17,767.20 for actual and necessary expenses incurred.

#### **a. Compensation Requested**

5. The services performed by EY LLP during the Fee Period included tax services. Attached hereto as Exhibit A is a detailed itemization, by project category, of all

services performed by EY LLP with respect to the Chapter 11 Cases during the Fee Period. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

6. The timekeepers who rendered services related to each category are identified in Exhibit A, along with the number of hours for each individual and the total compensation sought by each category. All services for which EY LLP requests compensation were performed for, or on behalf of, the Debtors.

**b. Expense Reimbursement**

7. EY LLP incurred out-of-pocket expenses during the Fee Period in the amount of \$17,767.20. Attached hereto as Exhibit B is a description of the expenses actually incurred by EY LLP in the performance of services rendered as Tax Services Provider to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: airfare, lodging, ground transportation, working meals, and other expenses. Value Added Tax (“VAT”) is a consumption tax in which certain foreign firms are required by local tax authority regulations to charge for services performed during this engagement.

8. In accordance with section 330 of the Bankruptcy Code, EY LLP seeks reimbursement only for the actual cost of such expenses to EY LLP. EY LLP submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

**Valuation of Services**

9. Professionals of EY LLP have expended a total of 2,526.70 hours in connection with this matter during the Fee Period.

10. The amount of time spent by each of the professionals' providing services to the Debtors for the Fee Period is set forth in Exhibit A. The rates are EY LLP's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by EY LLP for the Fee Period as Tax Services Provider for the Debtors in the Chapter 11 Cases is \$1,327,255.00.

11. EY LLP believes that the time entries included in Exhibit A attached hereto and the expense breakdown set forth in Exhibit B attached hereto are in compliance with the requirements of Local Rule 2016-2.

12. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

**Certificate of Compliance and Waiver**

13. The undersigned representative of EY LLP certifies that he has reviewed the requirements of Local Rules 2016-2 and that the Monthly Fee Statement substantially complies with such rule. To the extent that the Monthly Fee Statement does not comply in all respects with the requirements of Local Rule 2016-2, EY LLP believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Notice and No Prior Request**

14. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors and (d) all parties required to be given notice in the Interim Compensation Order. EY LLP submits that no other or further notice is necessary.

15. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

WHEREFORE, EY LLP respectfully requests that the Bankruptcy Court (i) approve the Monthly Fee Statement and (ii) grant such further relief as is just and proper.

/s/ Thomas M. Shea  
Thomas M. Shea  
Partner/Principal  
Ernst & Young LLP